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February 26, 2021

**BY ECF**

**MEMO ENDORSED**

Honorable Denise L. Cote  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Zalmund Zirkind, S9 19 Cr. 463 (DLC)***  
**LETTER MOTION FOR RETURN OF DEFENDANT'S PASSPORTS AND  
DISCHARGE OF BOND**

Dear Judge Cote:

Consistent with the Court's order Zalmund Zirkind timely surrendered to FCI Otisville SCP on Friday February 26, 2021.

The Defendant respectfully requests that an order enter permitting the return of his United States and Canadian passports, presently in the custody of Pretrial Services to the undersigned counsel or co-counsel, Johanna Zapp, so they may be returned to the Defendant's family.

The Defendant also respectfully requests the discharge of the Defendant's bond and collateral posted consistent with the Order of August 4, 2020, DE 72, with additional executed sureties submitted on August 13, 2020. The bond sought to be discharged was secured by property owned and the signatures of six cosigners: Aaron Cunin, Shaina Munitz, Yaakov Munitz, Nechama Turk, Israel Zirkind, and Shalom Zirkind.

The undersigned discussed this motion with USPO Rothman of Pretrial Services and AUSA Swett who have no objections to the relief requested. We thank Your Honor for your review.


Very truly yours,

/s/ Neil M. Schuster  
Neil M. Schuster

Application GRANTED.

SO ORDERED  
March 1, 2021

NMS:asnd  
Parties by ECF

  
DENISE COTE  
United States District Judge